

430030032
Input
8/14/00
JMM

From: Roger Westman <rwestman@ACHD.NET>
To: R3PA2.R3AIR(KENNEY-JAMES)
Date: 10/6/99 12:51pm
Subject: re: Clairton SOVs

Jim,

Each of the referenced Statement of Violations was paid in full by USS. Here are the amounts and dates received:

960304	\$9,025	rec'd 3/266/96	480
970701	7,300	8/18/98	481
980202	4,400	3/16/98	482
980602	4,725	6/30/98	483
990801/990802	48,925	8/31/99	484

We here in Allegheny County should be entering this information if that's possible. Let's make this a topic of our next call so that we can all assure ourselves that it is being handled correctly.

Haven't heard from you yet about the new time for the call. Hope you got my phone message that we're going to be in your offices on an enforcement negotiation on Oct 7 and need to reschedule the call once more. We're suggesting Friday afternoon, but are open to other dates.

Thanks,
Roger

----- Original Text -----

From: "JAMES KENNEY" <KENNEY.JAMES@epamail.epa.gov>, on 9/23/99 10:19 AM:

Roger/Sandra -

FYI - I came across a number of statement of violations issued by ACHD to Clairton (USS Clairton, USX Corp., 400 State Street, Clairton, PA 15025) and asked our AIRS data folks to make sure they had been input before I send them to our file room for final resting. We could not identify the following SOVs or results in AIRS:

3/14/96 - Settlement Offer for Statement of Violations No. 960304
7/31/97 - Settlement Offer for Statement of Violations No. 970701
3/3/98 - Settlement Offer for Statement of Violations No. 980202
06/17/98 - Settlement Offer for Statement of Violations No. 980602
8/10/99 - Settlement Offer for Statement of Violations 990801 and 990802

We could input the information but we don't have the results of these offers (so we would have to input "pending" which is probably not accurate). I just wanted to make you aware of this. If you would like to discuss, feel free to call me. Thanks -

Jim

(215) 814-2152

Allegheny County Health Department

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LEGAL SECTION
301 39th St.
Pittsburgh, PA 15201-1891

March 14, 1996

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FAX: (412) 578-8144

George T. Weber, Jr., Plant Manager
USS Clairton Works
USX Corporation
400 State Street
Clairton, PA 15025

RE: Settlement Offer; Statement of Violations No. 960304; USS Clairton Works; Air Pollution Control; Oct. - Dec., 1995

Dear Mr. Weber:

A Statement of Violations with regard to the USX Corporation USS Division Clairton Works, 400 State St., Clairton, 15025 (USX), has been turned over to my office by the County Health Department's Bureau of Environmental Quality for appropriate enforcement action. Specifically this letter addresses more than 12 alleged violations (observed by County Inspectors and from USX reports) of various provisions of Articles XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control ("Article XXI"), at your company's Clairton Works from October 1, 1995, through December 31, 1995. This letter also constitutes an offer to settle these alleged violations, without the cost and burden of litigation, by payment of a civil penalty to the County in the amount of \$9,025 by no later than Tuesday, April 16, 1996.

These alleged air pollution control violations at your Allegheny County Clairton Works, including Batteries 1, 2, 3, 7, 8, 9, 13, 14, 15, 19, 20, and B, involve the following:

- Excessive visible emissions from the charging of coke ovens at Battery 20 in violation of §2105.21.a.1 of Article XXI;
- Excessive visible emissions from the offtake piping at Battery 8 in violation of §2105.21.d.2 of Article XXI;
- Excessive visible emissions from the pushing of coke from Batteries 2, 7, 19, 20, and B in violation of §2105.21.e.4 of Article XXI; and

ALLEGHENY COUNTY HEALTH DEPARTMENT
DIVISION OF AIR QUALITY
USX CORPORATION - USS CLAIRTON WORKS
Coke Plant Performance Data
4th Quarter (October, November, December) 1995

SUMMARY

<u>Source</u>	<u>Violations</u>			<u>Civil Penalty Settlement Offer</u>
	<u>(except as noted)</u>	<u>non-de minimis</u>		
Visible Emissions				
Charging	1	1	x	\$ <u>525</u> = \$ <u>525</u>
Door Areas	0	0		
Charging Ports	0	0		
Offtake Piping	1	0		
Pushing				
with control device 20% Opacity Std.	6	6	x	\$ <u>850</u> = \$ <u>5,100</u>
transport w/o control 10% Opacity Std.	4	4	x	\$ <u>850</u> = \$ <u>3,400</u>
Combustion Stacks				
20% Opacity Std.	0	0		
60% Opacity Std.	0	0		
Pushing Control Unavailability 1.43%		0 (a)		
Coke Oven Gas Desulfurization				
Performance	0	0		
Unavailability (b)	13.34%			
Breakdown Reporting	0	0		
Flaring of Raw Coke Oven Gas	0 (c,d)	0		
Venting of Raw Coke Oven Gas	0 (c,d)	0		
Monthly & Monitoring Reports (timeliness, completeness, etc.)	0	0		
Total	12+	11		\$ <u>9,025</u>

- (a) Based on individual battery unit monthly performance.
(b) Unavailability of part of the desulfurization unit may not cause an exceedance of the standard. Unavailability for the fourth quarter involved outages of spare equipment or equipment for which spares are provided; desulfurization was in compliance 100% of the time (92 of 92 days).
(c) Number of battery 15-minute periods, or part thereof.
(d) Flaring: 0 battery-minutes; venting (unflared): 0 battery-minutes

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Coke Plant Performance Data
4th Quarter (October, November, December) 1995

<u>SOURCE</u>	<u>BATTERY</u>	<u>DATE</u>	<u>OBSERVATIONS</u>
<u>Visible Emissions</u>			
Charging	20	10/03	68 sec.
Door Areas			NO VIOLATIONS
Charging Ports			NO VIOLATIONS
Offtake Piping	08	10/02	5.08% leaking
Pushing			
w/control device	20	10/03	16 secs. $\geq 20\%$ (60% max.)
20% standard	20	10/04	15 60
	B	10/10	14 55
	07	10/16	10 95
	02	11/20	8 80
	19	12/04	7 100
transport in	20	10/03	21 secs. $> 10\%$ (30% max.)
open atmosphere	20	10/04	20 30
10% standard	07	10/16	10 60
	19	12/04	11 40
Combustion Stacks			
20% standard			NO VIOLATIONS
60% standard			NO VIOLATIONS

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Coke Plant Performance Data
4th Quarter (October, November, December) 1995

Pushing Control System Unavailability

<u>Battery No.</u>	<u>Uncontrolled Pushes</u>	
	<u>Month/Year</u>	<u>%</u>
1,2,3	10/95	0.91
	11/95	1.47
	12/95	0.12
7,8,9	10/95	1.25
	11/95	1.18
	12/95	0.36
13,14,15	10/95	4.04
	11/95	0.45
	12/95	1.90
19 & 20	10/95	5.40
	11/95	1.30
	12/95	0.98
B	10/95	0.00
	11/95	0.00
	12/95	0.00

Total Pushes (12 Batteries) : 95,034

Coke Oven Gas Desulfurization

Performance NO VIOLATIONS

Date

Unavailability 10/5,16-28

Total: 13 24-hr period(s), or
part thereof, w/o full use of
the desulfurization process.

Note: Unavailability for the fourth quarter involved outages of
spare equipment or equipment for which spares are provided.

Delayed Breakdown Reporting -- -- --

Venting/Flaring of Raw Coke Oven Gas

NO VIOLATIONS

Monitoring/Monthly Reports

NO VIOLATIONS2

ALLEGHENY COUNTY HEALTH DEPARTMENT
DIVISION OF AIR QUALITY
Coke Plant Enforcement Data
USX CORPORATION - USS CLAIRTON WORKS

4th Quarter (October, November, December) 1995

<u>SOURCE</u>	<u>TOTAL INSPECTIONS</u>	<u>VIOLATIONS</u>	<u>COMPLIANCE</u>
CHARGING	72	1	98.6%
DOOR AREAS	80	0	100
CHARGING PORTS	76	0	100
OFFTAKES	76	1	98.7
PUSHING			
Pushing \geq 20%	71	6	91.5
Travel $>$ 10%	71	4	94.4
STACKS			
\geq 20%	81	0	100
\geq 60%	81	0	100

01/05/96

**ALLEGHENY COUNTY HEALTH DEPARTMENT
DIVISION OF AIR QUALITY
Coke Plant Enforcement Data
USX CORPORATION - CLAIRTON WORKS**

Through the 4th Quarter (October, November, December) 1995

